

# **EXHIBIT (6)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re:

Case No.: 16-bk-12356-jlg

Chapter 13

NEELAM TANEJA,

Debtor.  
-----x

**CREDITOR THE HEALTH LAW FIRM, P.A.'S VERIFIED OPPOSITION TO**  
**DEBTOR NEELAM TANEJA'S "MOTION FOR SANCTION WILLFUL**  
**VIOLATION OF AUTOMATIC STAY" [SIC]**

COMES NOW, Creditor The Health Law Firm, P.A., f/k/a George F. Indest III, P.A.-  
The Health Law Firm, a Florida professional service corporation, appearing through its  
undersigned counsel for the purpose of opposing Debtor Neelam Taneja's "Motion for Sanction  
Willful Violation of Automatic Stay" [sic], and states:

1. Debtor Neelam Taneja is a medical doctor who has stated in multiple court filings  
and in prior bankruptcy filings that she is a resident of Florida. Debtor has used a number of  
other names including: Neelam T. Uppal, Neelam T. Taneja-Uppal, Neelam Uppal Taneja,  
Neelam Taneja Uppal, and Neelam Uppal.

2. Debtor Neelam Taneja is a prolific abusive pro se litigator, filing several frivolous  
~~and dilatory pleadings and filings throughout the state and federal courts of a number of different~~  
jurisdictions. A nationwide search of her various aliases on Westlaw or Lexis will produce most  
of these.

3. The Creditor's correct name is The Health Law Firm, P.A. It was formerly known  
as "George F. Indest III, P.A.--The Health Law Firm." It is a Florida professional service

corporation (or "professional association").

4. The Creditor filing this opposition is a Florida law firm, which obtained a money judgment from the Eighteenth Judicial Circuit Court in and for Seminole County, Florida.

5. The undersigned counsel representing Creditor The Health Law Firm, P.A., was admitted on a pro hac vice motion.

6. Debtor Neelam Taneja has served on the undersigned a "Motion for Sanction Willful Violation of Automatic Stay" [sic] naming Creditor The Health Law Firm, P.A., in its caption (referred to herein as the Motion for Sanctions).

7. A copy of this Motion for Sanctions, including the envelope in which it was served, is attached as Exhibit "1." Note that the envelope which Debtor Neelam Taneja used contains a Florida return address.

8. Nothing in the text of the Motion for Sanctions refers to any action alleged to have been taken by Creditor The Health Law Firm, P.A., or anyone else on its behalf.

9. All allegations made in the Motion for Sanctions incoherently address actions allegedly taken by other creditors in other jurisdictions. For example:

- a. In the opening paragraph of Debtor Neelam Taneja's Motion for Sanctions, she states: "Comes now, Defendant [sic] Neelam Uppal [sic]<sup>1</sup> files [sic] an objection to new writ of garnishment by Creditor Charlene Rodriguez. . .

. " Charlene Rodriguez is a different creditor represented by a different law firm.

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<sup>1</sup> This slip-up by the Debtor shows that she still thinks of herself as and uses the name "Neelam Uppal" even though she filed the current bankruptcy case under the alias "Neelam Taneja."

- b. In the paragraph of Debtor Taneja's Motion for Sanctions in which she asks for relief, paragraph 8, states: "Wherefore, the debtor requests . . . that the writ be quashed and the injunction entered against the Pinellas County Court Final judgment [sic] for garnishment." Debtor The Health Law Firm does not have any judgment, writ, injunction or garnishment from any Pinellas County Court.

10. It is believed that Debtor Neelam Taneja has just done here what she has always done in her other court filings, in different courts, over and over again. She merely takes other filings she has made in other cases or related to other matters, changes a few words, without any thought being given to truth, accuracy or relevance, and refiles frivolous pleadings over and over again.

11. Creditor The Health Law Firm, P.A., opposes Debtor Neelam Taneja's Motion for Sanctions on the following additional grounds:

- a. Creditor The Health Law Firm, P.A., has taken no action that would violate any stay of this court or any other court.
- b. Debtor Neelam Taneja's Motion for Sanctions contains no specific allegation as to time, place or any specific action taken that would have violated a stay.
- c. ~~Debtor Neelam Taneja's Motion for Sanctions is vague and incoherent to~~  
the point that attempting to refute any specific allegation she makes is impossible.
- d. Debtor Neelam Taneja's Motion for Sanctions did not contain any

notarization or oath as to truth based on actual, personal knowledge. The

"Declaration" on the served copy, Exhibit "1," was not signed or dated.

- e. Debtor Neelam Taneja's Motion for Sanctions is a fraudulent sham filing containing false conclusory statements.

12. This Court should enter an order denying Debtor Neelam Taneja's Motion for Sanctions, prohibit her from filing similar motions in the future without first requesting the Court's permission to do so and obtaining it, and grant Creditor The Health Law Firm, P.A., its attorneys fees and costs associated with responding to Debtor Neelam Taneja's Motion for Sanctions (after ordering her to show cause why monetary sanctions should not issue).

#### **MEMORANDUM OF LAW**

Rule 9011(b), Federal Rules of Bankruptcy Procedure, states in relevant part:

(b) Representations to the Court. By presenting to the court . . . a . . . written motion, or other paper, an . . . unrepresented party is certifying that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances,—

- (1) it is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;
- (2) the claims, defenses, and other legal contentions therein are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;

- (3) the allegations and other factual contentions have evidentiary support.

...

In the present case, Debtor Neelam Taneja has violated this Rule by filing a frivolous Motion for Sanctions. Her statements have no basis in fact or in law. Her motion is confused and confusing.

Rule 9011(c)(1)(A), Federal Rules of Bankruptcy Procedure, states:

A motion for sanctions under this rule shall be made separately from other motions or requests and shall describe the specific conduct alleged to violate subdivision (b). . . . [T]he court may award to the party prevailing on the motion the reasonable expenses and attorney's fees incurred in presenting or opposing the motion. . . .

Debtor Neelam Taneja has violated this section of the Rule, as well. She has no specifics in her Motion. She makes no attempt to specify any dates, places, times or actions that have been taken that would warrant any sanction, much less who took such actions.

Rule 9011(c)(2), Federal Rules of Bankruptcy Procedure, states in relevant part:

A sanction imposed for violation of this rule shall be limited to what is sufficient to deter repetition of such conduct or comparable conduct by others similarly situated. Subject to the limitations in subparagraphs (A) and (B), the sanction may consist of, or include, directives of a nonmonetary nature, an order to pay a penalty into court, or, if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of some or all of the reasonable attorneys' fees and other expenses incurred as a direct result of the violation.

In accordance with section of Rule 9011, this Court should sanction Debtor Neelam Taneja to discourage her dilatory and frivolous abuse of the court system, as well as order her to show cause why attorneys fees and costs should not be awarded against her.

**RELIEF REQUESTED**

Creditor, The Health Law Firm, P.A., respectfully requests this Court enter an Order denying Debtor Neelam Taneja's Motion for Sanctions, prohibit her from filing similar motions in the future without first requesting the Court's permission to do so and obtaining it, and grant Creditor The Health Law Firm, P.A., its attorneys fees and costs associated with responding to Debtor Neelam Taneja's Motion for Sanctions (after ordering her to show cause why monetary sanctions should not be assessed against her).

**VERIFICATION**

I, the undersigned, do hereby declare under oath that the facts set forth above are true and that I have personal knowledge of them.

  
GEORGE F. INDEST III

**NOTARIZATION**

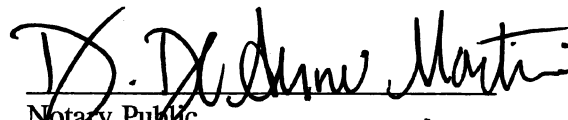
STATE OF FLORIDA     )  
                                      )  
COUNTY OF SEMINOLE )

The foregoing was acknowledged and subscribed before me, an officer duly authorized in the state and county indicated above, to take oaths and acknowledgments, by George F. Indest III, who is personally known to me and who did take an oath. Done this 15th day of December 2016.

(Stamp/Seal)

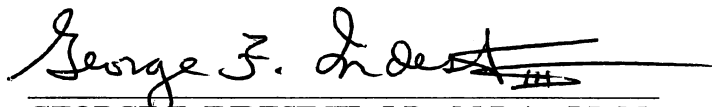


D. DEANNE MARTIN  
MY COMMISSION # FF 185565  
EXPIRES: December 28, 2018  
Bonded Thru Budget Notary Services

  
Notary Public  
Print Name: D. DeAnne Martin

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will send notice of such filing to registered CM/ECF users and I further certify that I have mailed the foregoing true and correct copy of documents by first class mail, postage prepaid, to the following: Bankruptcy Trustee Jeffrey L. Sapir at 399 Knollwood Road, Suite 102, White Plains, New York 10603 and electronically at [info@sapirch13tr.com](mailto:info@sapirch13tr.com); Debtor, Neelam Taneja, at 1370 Broadway #504, New York, New York 10018; and all other persons on the Creditor Matrix; on this 15th day of December 2016.



**GEORGE F. INDEST III, J.D., M.P.A., LL.M.**

Florida Bar No.: 382426

**Admitted Pro Hac Vice**

Primary e-mail: [GIndest@TheHealthLawFirm.com](mailto:GIndest@TheHealthLawFirm.com)

Secondary e-mail: [CourtFilings@TheHealthLawFirm.com](mailto:CourtFilings@TheHealthLawFirm.com)

**TRIAL COUNSEL/LEAD ATTORNEY**

**ATTORNEY TO BE NOTICED**

**THE HEALTH LAW FIRM**

1101 Douglas Avenue

Altamonte Springs, Florida 32714

Telephone: (407) 331-6620

Telefax: (407) 331-3030

**ATTORNEYS FOR CREDITOR,**

**THE HEALTH LAW FIRM, P.A.**

Attachment:

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Exhibit "1" Debtor Neelam Taneja's Motion (w/envelope)



UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

Neelam Taneja,  
Debtor.

Case No.: 16--12356-jlg  
Chapter: 13

v.

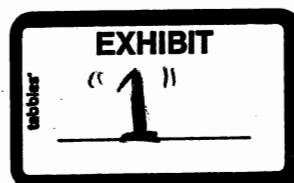
**George Indest**  
**Healthlaw firm**

\_\_\_\_\_ /

**MOTION FOR SANCTION WILLFUL VIOLATION OF AUTOMATIC STAY**

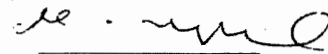
Comes now Defendant, Neelam Uppal files an objection to new writ of garnishment filed by Creditor Charlene Rodriguez after being served with the 'Notice of Bankruptcy' and Defendant relies on variety of grounds in support of submission

1. The case is under Automatic stay of a new bankruptcy.
2. The Creditors, after being served with the notice of new Bankruptcy, as willful violation of the automatic Stay, fraud and corruption and conspiracy are obtaining such an order to enforce debt.
3. The Creditor already took the money, \$9000.00 as retainer for one pleading.
4. Plaintiff does not have the right to make a second writ, as it is beyond the Statute of Limitation and for failure to prosecute
5. This court has Jurisdiction pending Bankruptcy. The Creditor has not obtained relief under this bankruptcy.
6. Creditor's Judgment is invalid pursuant to F.S 1530 as it was obtained by fraudulent means by producing fake bills.



7. The creditor owes damages for automatic stay violation.
8. Wherefore, the debtor requests that the Automatic stay be enforced under 11 U.S.C 362 and that the writ be quashed and an injunction entered against the Pinellas County Court Final judgement for garnishment

Respectfully submitted



NEELAM UPPAL, PRO SE

DECLARATION

The undersigned Debtor named in the foregoing Motion to Continue Automatic Stay as to All Creditor hereby makes a solemn oath that thatements contained here are true and correct to the best of the Debtor's knowlwdge, information and belief.

Respectfully submitted.

Date: \_\_\_\_\_

Neelam Taneja, Debtor *Pro se*.

**1370 Broadway, #504  
NEW YORK, NY-10018  
PH.- (646)-740-9141**

N. Uppeal  
P.O. box 1002  
Largo, FL 33779

RECEIVED  
OCT 28 2016  
BY:

U.S. POSTAGE  
PAID  
PRINCETON JUNCTION, NJ  
08560  
OCT 25 16  
AMOUNT  
**\$0.47**  
R23038104638-01



32714



1000

Healthcare Firm  
1106, Douglas Ave  
Altamonte Springs, FL 32714

32714\$2032 0025



**File an answer to a motion:**

16-12356-jlg Neelam Taneja

**U.S. Bankruptcy Court**

**Southern District of New York**

**Notice of Electronic Filing**

The following transaction was received from George F. Indest entered on 12/15/2016 at 6:10 PM and filed on 12/15/2016

**Case Name:** Neelam Taneja

**Case Number:** 16-12356-jlg

**Document Number:** 64

**Docket Text:**

Opposition filed by George F. Indest III on behalf of The Health Law Firm. (Indest, George)

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**Verified Opposition to Debtor 12-15-16.pdf

**Electronic document Stamp:**

[STAMP NYSBStamp\_ID=842906028 [Date=12/15/2016] [FileNumber=15741060-0]  
] [7c0b247a23eb96819138625b9d75f0fc46fe5fc30d4b3b471b512d074392722d2f1  
a44f371faf03147f7f3d7c16c9b151bcec57ba9c1ca3a52a895c8ebee40fc]]

**16-12356-jlg Notice will be electronically mailed to:**

Jenelle C Arnold on behalf of Creditor Nationstar Mortgage LLC  
bkecfinbox@aldridgepите.com, jarnold@ecf.inforuptcy.com

Katherine Heidbrink on behalf of Creditor Nationstar Mortgage LLC as servicer for The Bank of New York Mellon f/k/a The Bank of New York as Trustee for Home Equity Loan Trust 2007-FRE1  
kheidbrink@logs.com, nybkcourt@logs.com

George F. Indest, III on behalf of Unknown The Health Law Firm  
courtfilings@thehealthlawfirm.com

Jeffrey L. Sapir-13  
info@sapirch13tr.com

Nicole E. Schiavo on behalf of Creditor Wells Fargo Bank, N.A.  
nicole.schiavo@hoganlovells.com, marie.ferrara@hoganlovells.com

Karen Sheehan on behalf of Creditor Wells Fargo Bank, N.A.  
ksheehan@flwlaw.com, jspiegelman@flwlaw.com;plamberti@flwlaw.com

Maria A. Tsagaris on behalf of Creditor Nationstar Mortgage LLC

BankruptcyECFMail@mccallaraymer.com

George Barry Wilkinson on behalf of Attorney G. Barry Wilkinson  
gbarryw@tampabay.rr.com, mfoster21@tampabay.rr.com

**16-12356-jlg Notice will not be electronically mailed to:**

George F. Indest, III on behalf of Unknown The Health Law Firm  
The Health Law Firm  
1101 Douglas Avenue  
Altamonte Springs, FL 32714

Pinellas County Tax Collector  
PO Box 4006  
Seminole, FL 33775-4006

Neelam Taneja  
1370 Broadway  
#504  
New York, NY 10018

United States Trustee  
Office of the United States Trustee  
U.S. Federal Office Building  
201 Varick Street, Room 1006  
New York, NY 10014

**DeAnne Martin**

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**From:** nysbinfo@nysb.uscourts.gov  
**Sent:** Thursday, December 15, 2016 6:11 PM  
**To:** courtmail@nysb.uscourts.gov  
**Subject:** 16-12356-jlg Opposition

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U.S. Bankruptcy Court  
Southern District of New York

Notice of Electronic Filing

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Case Name: Neelam Taneja  
Case Number: 16-12356-jlg <https://ecf.nysb.uscourts.gov/cgi-bin/DktRpt.pl?268625>

Document Number: 64

Copy the URL address from the line below into the location bar of your Web browser to view the document:  
[https://ecf.nysb.uscourts.gov/doc1/126017019221?pdf\\_header=&magic\\_num=89327397&de\\_seq\\_num=163&caseid=268625](https://ecf.nysb.uscourts.gov/doc1/126017019221?pdf_header=&magic_num=89327397&de_seq_num=163&caseid=268625)

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Document description: Main Document

Original filename: Verified Opposition to Debtor 12-15-16.pdf Electronic document Stamp:

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[bkecfinbox@aldridgepate.com](mailto:bkecfinbox@aldridgepate.com), [jarnold@ecf.inforruptcy.com](mailto:jarnold@ecf.inforruptcy.com)

Katherine Heidbrink on behalf of Creditor Nationstar Mortgage LLC as servicer for The Bank of New York Mellon f/k/a The Bank of New York as Trustee for Home Equity Loan Trust 2007-FRE1  
kheidbrink@logs.com, nybkcourt@logs.com

George F. Indest, III on behalf of Unknown The Health Law Firm  
courtfilings@thehealthlawfirm.com

Jeffrey L. Sapir-13  
info@sapirch13tr.com

Nicole E. Schiavo on behalf of Creditor Wells Fargo Bank, N.A.  
nicole.schiavo@hoganlovells.com, marie.ferrara@hoganlovells.com

Karen Sheehan on behalf of Creditor Wells Fargo Bank, N.A.  
ksheehan@flwlaw.com, jspiegelman@flwlaw.com;plamberti@flwlaw.com

Maria A. Tsagaris on behalf of Creditor Nationstar Mortgage LLC  
BankruptcyECFMail@mccallaraymer.com

George Barry Wilkinson on behalf of Attorney G. Barry Wilkinson gbarryw@tampabay.rr.com,  
mfoster21@tampabay.rr.com

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George F. Indest, III on behalf of Unknown The Health Law Firm  
The Health Law Firm  
1101 Douglas Avenue  
Altamonte Springs, FL 32714

Pinellas County Tax Collector  
PO Box 4006  
Seminole, FL 33775-4006

Neelam Taneja  
1370 Broadway  
#504  
New York, NY 10018

United States Trustee  
Office of the United States Trustee  
U.S. Federal Office Building  
201 Varick Street, Room 1006  
New York, NY 10014